The Honorable Marsha J. Pechman

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

YOLANY PADILLA, IBIS GUZMAN, BLANCA ORANTES, BALTAZAR VASQUEZ,

Plaintiffs-Petitioners,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ("ICE"); U.S. DEPARTMENT OF HOMELAND SECURITY ("DHS"); U.S. CUSTOMS AND BORDER PROTECTION ("CBP"); U.S. CITIZENSHIP IMMIGRATION SERVICES ("USCIS"); EXECUTIVE OFFICE FOR IMMIGRATION REVIEW ("EOIR"); TAE D. JOHNSON, Acting Director of ICE; ALEJANDRO MAYORKAS, Secretary of DHS; CHRIS MAGNUS, Commissioner of CBP; UR M. JADDOU, Director of USCIS; ELIZABETH GODFREY, Seattle Field Office Director, ICE, MERRICK B. GARLAND, United States Attorney General; LOWELL CLARK, warden of the Northwest Detention Center in Tacoma, Washington; CHARLES INGRAM, Warden of the Federal Detention Center in SeaTac, Washington; DAVID SHINN, Warden of the Federal Correctional Institute in Victorville, California; JAMES JANECKA, Warden of the Adelanto Detention Facility;

No. 2:18-cv-928 MJP

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER REQUIRING FURTHER STATUS REPORT

NOTE ON MOTION CALENDAR: SEPTEMBER 30, 2022.

Defendants-Respondents.

The parties hereby respond to this Court's order of September 6, 2022 (ECF no. 189), and advise the following.

The parties have discussed the next steps in this litigation over email and over the phone, and those discussions continue, along with review of pertinent data. The parties continue to agree that exploring settlement of the credible fear claims in this case may be fruitful at this time. The parties are in discussion about how best to proceed, such as how this case should be handled during mediation, and request that they be allowed to continue to discuss, so that they may propose to this

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO RESPOND TO COURT'S 9/6/22 ORDER - 1 CASE No. 2:18-cv-928 MJP U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 305-7037

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1	Court a plan for referral to mediation if warranted, as well as propose how best to proceed with		
2	the bond hearing claims. Thus, the parties request that this Court set a deadline to provide a further status report to the Court in 60 days (to and including Tuesday, November 29, 2022) so they can		
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4	propose a potential path forward for settlement discussions and propose the next steps for the bon hearing claims. Accordingly, the parties have attached a proposed order to that effect.		
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JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO RESPOND TO COURT'S 9/6/22 ORDER - 2 U.S. Department of Justice, Civil Division Office of Immigration Litigation, District Court Section PO Box 868, Ben Franklin Station Washington, DC 20044 Telephone (202) 305-7037

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1	RESPECTFULLY SUBMITTED this 30th day of September, 2022.		
	s/ Matt Adams	Trina Realmuto*	
2	Matt Adams, WSBA No. 28287	Kristin Macleod-Ball *	
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4	A W 4 ' WGD A N 52074	NATIONAL IMMIGRATION	
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18	BRIAN M. BOYNTON	LAUREN C. BINGHAM	
19	Principal Deputy Assistant Attorney General	Senior Litigation Counsel	
	Civil Division		
20		<u>/s/ Jesi J. Carlson</u>	
21	WILLIAM C. PEACHEY	JESI J. CARLSON	
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22	Office of Immigration Litigation	Appellate Section Office of Immigration Litigation	
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	Assistant Director, Appellate Section	Attorneys for Defendants-Respondents	
26	1 ionismit Director, 1 ippendic occuon	Inorneys for Defendants Respondents	
	JOINT STATUS REPORT	U.S. Department of Justice, Civil Division	
	AND STIPULATION AND	Office of Immigration Litigation, District Court Section	

PO Box 868, Ben Franklin Station

Washington, DC 20044 Telephone (202) 305-7037

[PROPOSED] ORDER

RESPOND TO COURT'S 9/6/22 ORDER - 3 CASE No. 2:18-cv-928 MJP

EXTENDING DEADLINE TO

[PROPOSED] ORDER

Based on the foregoing stipulation of the parties, IT IS SO ORDERED. The parties are required to submit a further status report on or before Tuesday, November 29, 2022 proposing a path forward for any settlement discussions, as well as the next steps in litigation.

DATED this _____ day of September, 2022.

THE HONORABLE MARSHA J. PECHMAN UNITED STATES DISTRICT JUDGE

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO RESPOND TO COURT'S 9/6/22 ORDER - 4

CASE No. 2:18-cv-928 MJP

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2022, I had the foregoing electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

/s/ Jesi J. Carlson JESI J. CARLSON Senior Litigation Counsel

Attorney for Defendants-Respondents

JOINT STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO RESPOND TO COURT'S 9/6/22 ORDER - 5

CASE No. 2:18-cv-928 MJP

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